

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

DAVID CHERRY, Personal Representative)
of the ESTATE OF PAMELA CHERRY,)
DECEASED,)

Plaintiff,)

vs.)

MACON HOSPITAL, INC. d/b/a MACON)
COUNTY GENERAL HOSPITAL and)
HANNA C. ILIA, M.D.,)

Defendants.)

CASE NO. 2:12-cv-00043

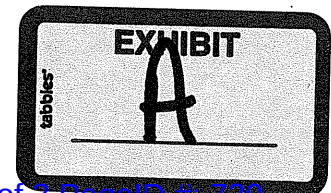
PLAINTIFF'S EXPERT DISCLOSURE

Comes now the Plaintiff, by counsel, and respectfully submits his list of expert witnesses whom he may call upon to testify at the trial of this matter.

The following witnesses have been retained or specially employed to provide expert testimony and attached hereto are copies of their reports, C.V.s, prior testimony listings, publications, and fee schedules:

1. Richard M. Sobel, M.D., M.P.H.
101 Passage Point
Peachtree City, GA 30269

Dr. Sobel is an emergency physician licensed and practicing in the contiguous State of Georgia. Dr. Sobel is familiar with the applicable standard of care for emergency room care and services, including those services provided in communities and institutions comparable to Macon County General Hospital. Dr. Sobel will testify as to Dr. Ilia's deviations from the standards of reasonable skill and care in diagnosing or ruling out a cardiac cause for Pamela Cherry's chest, back, and jaw pain which were directly attributable to her eventual cardiac related death. Dr. Sobel will additionally testify as to the deviations of care of Macon County General Hospital, and its agents and employees, including following their own protocols, all of which led directly to Pamela Cherry's death.



Dr. Mathis will have a table summarizing the economic losses consistent with his report.

The following witnesses have not been retained nor specially employed to testify as expert witnesses, but by virtue of their training, education, experience, their official capacities, and involvement in this matter in their professional capacities, have findings, observations, measurements, and/or opinions to render. Treating medical professionals are expected to testify as to their diagnosis as well as the cause of the conditions confronting Pamela Cherry and their relationship to the care rendered to Pamela Cherry on May 30, 2011. They will additionally comment on the reasonableness and necessity of the medical expenses incurred by Pamela Cherry prior to her passing.

4. Joseph L. Fredi, M.D.
Vanderbilt Heart & Vascular Institute
1215 21st Ave. S.
Nashville, TN 37232

Plaintiff reserves the right to designate other expert witnesses as provided for in the Federal Rules of Civil Procedure to respond to and to rebut the experts designated by any other party, if any are so designated.

Plaintiff reserves the right to call any other duly qualified expert to provide the Court the benefit of their testimony and analysis of any care, work, or efforts they provided to the parties, or to any other person or entity who was investigating, researching, or interested in this matter.

Plaintiff reserves the right to call any and all fact or expert witnesses designated by any party in this case.

Plaintiff reserves the right to read the deposition of any and all of the witnesses who have testified, or are called at the time of trial to testify, and all of said witnesses who have previously

testified by way of deposition, and to elicit from said witnesses any and all expert testimony for which they may be competent to give.

Plaintiff also reserves the right to withdraw any of the expert witnesses listed at any time.

Respectfully submitted,

WILSON KEHOE WININGHAM LLC



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